



**General Services Administration  
National Capital Region**

May 29, 2020

Ms. Patricia Plummer and Dr. Emmanuel Irono  
CAC- Motir Joint Venture, LLC  
1508 East Capitol St., NE  
Washington, DC 20003

Subject: 1800F Collocation, Auditorium and Childcare Center Project (Contract No  
47PM1119C0006)  
Ref: Remobilization Plan and Fan Coil Unit Work – CURE Notice

Dear Ms. Plummer and Dr. Irono:

You are notified that the Government considers your failure to provide a remobilization plan and schedule a condition that is endangering performance of the contract. Therefore, unless this condition is cured by Wednesday, June 3, 2020, the Government may terminate for default under the terms and conditions of the FAR 52.249-10, Default (Fixed Priced Construction) clause of this contract.

GSA has provided multiple written notices to CAC-Motir Joint Venture, LLC (JV) regarding the submission of a finalized remobilization plan and schedule as well as provided direction regarding the completion of the work associated with heating, ventilation and air conditioning (HVAC) throughout project areas. Although JV's letter dated May 27, 2020 speaks to both concerns, it fails to communicate the requested information.

JV has failed to provide a remobilization plan and schedule. JV's communication indicating June 15, 2020 as an intended start date is not finite. The start date, submission of the project schedule and decision matrix are projected based upon contingencies of a pending financial transaction and completion of negotiations with the bonding company; not due to JV concerns for the health and safety of their team as a result of the COVID-19 pandemic as previously stated.

GSA's letter to JV dated April 30, 2020 cites the scope of work and the Government's intent concerning your performance of HVAC work. GSA continues to maintain its position stated in our letter dated May 20, 2020 directing JV to perform the work per FAR 52.243-1 and proceed with the claims process after work is completed.

As stated above, a response containing your remobilization plan, schedule and supplemental documentation are required by Wednesday, June 3, 2020 to avoid further action by GSA. If you have any questions pertaining to this letter, please feel free to contact the undersigned at (202) 365-6394.

Sincerely,

**Chrischanda Smith**  
Chrischanda S. Smith  
Contracting Officer

Digitally signed by Chrischanda Smith  
DN: OU=Construction Services Division,  
Center 3\*, O=Office of Acquisition,  
CN=Chrischanda Smith,  
E=Chrischanda.Smith@gsa.gov  
Reason: I am approving this document  
Location: your signing location here  
Date: 2020-05-29 14:58:15  
Foxit PhantomPDF Version: 9.7.1

cc: Aaron Hassinger, GSA; Chris Hudson-Boyd, GSA; Ashley Abdullah, AFG; Kai Goodrich, AFG; Jennifer Jones, Motir; Eric Anderson, Warner; and Jim Merlene, Warner